

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM (formerly known as
ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**DEFENDANT'S ASSENTED-TO MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL**

Pursuant to Local Rule 7.1(B)(2), Dexia Bank Belgium ("Dexia") respectfully moves this Court to grant an extension of time to respond to Plaintiffs' Motion to Compel documents withheld or redacted as privileged and memorandum of law submitted in support thereof. In support of this Motion, Dexia states as follows:

1. On June 16, 2006, Plaintiffs in the above-captioned cases filed a Motion to Compel production of certain documents withheld or redacted as privileged by Dexia.
2. On June 27 and 28, 2006, Dexia produced revised privilege logs addressing many of the concerns raised by plaintiffs. In light of this development, Plaintiffs agreed to extend Dexia's time to respond to the motion to compel to July 14, 2006, to allow additional time for the parties to attempt to resolve or narrow the issues. On June 30, 2006, Dexia filed for an assented-to motion for an extension, which the Court granted on July 6, 2006.
3. In a letter dated July 12, 2006, Plaintiffs indicated that they intend to submit a supplemental filing to the Court. The parties have not yet had the opportunity to meet and confer

concerning the issues to be raised in the supplemental filing, but expect to do so in the near future.

4. Dexia has requested an extension of time to respond to Plaintiffs' motion to compel to a date two weeks after the supplemental filing proposed by Plaintiffs. By letter dated July 14, 2006, Plaintiffs have assented to that request.

Wherefore, Dexia respectfully requests that this Court enter an order in each of the above-captioned actions granting Dexia an extension of time to respond to Plaintiffs' motion to compel documents withheld or redacted as privileged, and allowing Dexia to file its opposition papers two weeks after the proposed supplemental submission by Plaintiffs.

Dated: July 14, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO

/s/ Breton Leone-Quick
Peter M. Saparoff (BBO#441740)
Breton Leone-Quick (BBO#655571)

One Financial Center
Boston, MA 02111
Tel: (617) 542-6000
Fax: (617) 542-2241

James B. Weidner
Jeff E. Butler
Kara Morrow
CLIFFORD CHANCE US LLP
31 West 52nd Street
New York, NY 10019-6131
Tel: (212) 878-8000
Fax: (212) 878-8375

Counsel for Dexia Bank Belgium

Local Rule 7.1(A)(2) Certification

Counsel for Dexia hereby certifies that, pursuant to Local Rule 7.1(A)(2), they have conferred in good faith with counsel for Plaintiffs who assent to this motion.

Certificate of Service

I, Breton Leone-Quick, hereby certify that this document, along with its exhibit, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 14, 2006.

/s/ Breton Leone-Quick

Dated: July 14, 2006